

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	MAGISTRATE NO. 21-MJ-533
	:	
SAMUEL LAZAR,	:	
	:	
Defendant.	:	

SUPPLEMENTAL MOTION FOR DETENTION
PENDING TRIAL

The United States of America, by and through its Attorney, the Acting United States Attorney for the District of Columbia, respectfully submits this supplemental memorandum in support of its oral motion that the defendant, Samuel Lazar, be detained pending trial, pursuant to 18 U.S.C. §§ 3142(f)(1)(A) and (g).

At the defendant’s detention hearing on August 11, 2021, the government presented evidence the defendant had attempted to acquire firearms in contradiction of the law on multiple occasions, most recently in 2015, which led to the defendant’s 2016 conviction for lying on the Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 in an attempt to obtain a firearm at a gun show. The Court questioned the government on the recency of the defendant’s latest attempt to obtain a firearm to which the government advised the Court that, to its knowledge at the time, the 2015 incident was the most recent.

Today, the government became aware of the attached photographs, which are relevant to the Court’s question regarding the defendant’s most recent firearm activity. On August 17, 2020, the Concerned Citizens of Lebanon Pennsylvania posted the following comment to their Facebook page:

“Alleged gunplay next to a public sidewalk and busy roadway by Palmyra business owners and patrons this past weekend.”

Accompanying the post were a number of photographs, many of which the government obtained and included here. In the photographs, the defendant is pictured wearing a black t-shirt, jean shorts and white sneakers while holding at least two different firearms.

Gov. Photo 1: Appears to be the source of the photographs, a social media posting from an unidentified individual 11 hours prior to whenever it was viewed and copied and directed at “Taste Of Sicily” (a restaurant in Palmyra, PA) stating the following:

“I truly admire the love and freedom we all shared this weekend, especially to then share with others (emoji) The family atmosphere is so valued, no matter your views, being kind and empathetic is what matters! Beyond grateful (emojis)”

Gov. Photo 2: The defendant holding an AR type firearm with an inserted magazine

Gov. Photo 3: The defendant in the background holding a handgun pointed in the air and an American flag behind two people holding AR type firearms

Gov. Photo 4: The defendant in the background holding an American flag behind two people holding firearms

Gov. Photo 5: The defendant aiming an AR type firearm

Gov. Photo 6: The defendant aiming a handgun

Gov. Photo 7: individual at the rally with an AR type firearm

The defendant’s participation in this rally, which consisted of his holding and aiming firearms on a public street corner, purportedly in Palmyra’s business district, further underscores the defendant’s dangerousness to the community.

While the government cannot comment on whether the firearms in the photographs are loaded, the defendant is holding an assault rifle that has a 30-round magazine inserted in it. Further, in multiple pictures, the defendant is aiming these firearms while standing on what

appears to be a public street. Given that the posting was made by the Concerned Citizens of Lebanon Pennsylvania, the community took note of the defendant's actions and its danger.

For the reasons put forth by the government in previous filings, at the detention hearing on August 11, 2021 and herein, the United States respectfully requests the Court grant the government's motion to detain the defendant pending trial.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY

/s/Douglas G. Collyer

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Date: August 16, 2021



Concerned Citizens of Lebanon

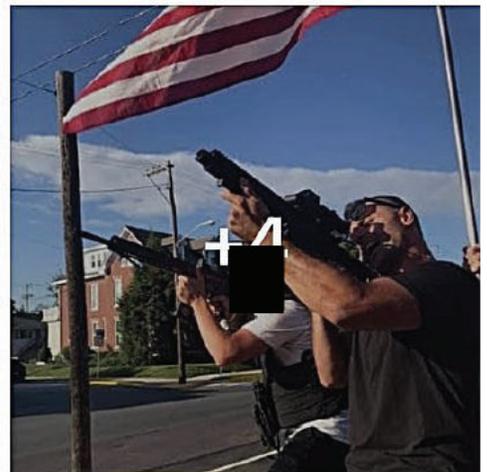


Pennsylvania

Aug 17, 2020 · 🌐

Alleged gunplay next to a public sidewalk and busy roadway by Palmyra business owners and patrons this past weekend.

Palmyra Borough Police Department #palmyrapa
#palmyra



I truly admire the love and freedom we all shared this weekend, especially to then share with others



The family atmosphere is so valued, no matter your views, being kind and empathetic is what matters!
Beyond grateful 🇺🇸❤️



Taste Of Sicily
Italian · Palmyra, PA



Gov. photo 1

👍❤️ 49

7 Comments · 1 Share



Gov. photo 3



Gov. photo 4



Gov. photo 5



Gov. photo 6



Gov. photo 7

